



# CITY OF HOUSTON

Mayor's Office  
Public Safety and Homeland Security

**Sylvester Turner**

Mayor

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May 11, 2018

**Chairman Ajit Pai**  
**Commissioner Mignon Clyburn**  
**Commissioner Michael O'Rielly**  
**Commissioner Brendan Carr**  
**Commissioner Jessica Rosenworcel**  
**Federal Communications Commission**  
445 12th Street, SW  
Washington, DC 20554

**Mr. Chairman and Commissioners,**

After enduring repeated winter and spring storms, the City of Houston and the rest of the country lacks the technology updates to make the Wireless Emergency Alerts (WEA) system a strong and adaptable tool. We are writing to express our concern that multimedia enhancements have not been approved as a critical update for the WEA system.

After Hurricane Harvey in August 2017, our City faced the prospect of two reservoirs, Addicks and Barker, overtopping their dams and potentially suffering a catastrophic failure. To ensure that residents were protected, evacuations were ordered. These evacuations only affected a limited area, and messaging was conducted via local media highlighting the areas where residents needed to leave their homes. We did not have the capability to send multimedia messaging via Wireless Emergency Alerts. If we did, we could have better targeted those in the evacuation area and delivered precise instructions to those who needed the information the most.

While Hurricane Harvey was a storm of near-unheard of proportions, our region also faces smaller-scale incidents on a much more regular basis. When transportation incidents affecting major Interstate Highways and State and US Routes occur, multimedia capabilities with WEA would allow our traffic management partners to send detour information directly to drivers in an affected area. Hazardous releases due to chemical emergencies or fires in commercial and industrial buildings can necessitate shelter-in-place orders, and residents unfamiliar with those procedures would benefit from visual directions on how to protect themselves. And while we have had great success with sending AMBER, BLUE, and SILVER ALERT information via traffic Dynamic Message Signs and emails; being able to include a photographs and example vehicle pictures along with WEA alerts would only increase the chances of a successful alert resolution.

In this age of instant access to visual information via social media applications, we need to enhance our country's ability to rapidly, efficiently, and securely deliver comprehensive emergency information, including images, to the public. Pictures provide instant recognition and speak a universal language. Most importantly, they enable rapid response from every potential witness who could save countless lives through fast action. Again, the Chelsea

bombings in New York City highlighted this major weakness in the WEA system. Millions of residents who wanted to help find the suspect were given no other option but to take additional time to search for his photo. In any emergency, time is often a commodity we can't afford to waste.

Allowing for multimedia content in WEA messages would greatly increase the ability of public safety officials to reach residents with access and functional needs. While efforts are being made to address the need for multilingual communications in WEA messages (REFERENCE 1), individuals who are deaf or hard of hearing need visual cues not currently available in WEA messages. American Sign Language (ASL) is a complete, complex language that employs signs made by moving the hands combined with facial expressions and postures of the body. It is the primary language of many North Americans who are deaf and is one of several communication options used by people who are deaf or hard-of-hearing. ASL is a language completely separate and distinct from English. It contains all the fundamental features of language—it has its own rules for pronunciation, word order, and complex grammar. (REFERENCE 2)

On January 30, the FCC took the first step toward making the nation's WEA system achieve these readily available technological upgrades. The adoption of geo-targeting standards will enhance the ability to send targeted messages, but without multimedia capability, the messages will still be limited in effectiveness. It is essential that we build on the progress already made by the FCC to continue improving the WEA system to its highest capacity. Allowing multimedia content, including thumbnail images and instructional infographics, in WEA messages on 4G, 5G, and all future networks is not only necessary, but also expected from the public.

The City of Houston urges the FCC to act to meet the need for multimedia enhancements to WEA messages. We respectfully request that the FCC take immediate action to ensure that industry meet these standards.

Sincerely,



George T. Buenik  
Director of Public Safety and Homeland Security  
City of Houston

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#### REFERENCES

1 See FCC Report and Order, page 38, September 29, 2016

2 See NIH NIDCD American Sign Language, <https://www.nidcd.nih.gov/health/american-sign-language>